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February 7, 2024

The Government is hereby directed to file a response letter and proposed *Curcio* script by 10 P.M. on February 7, 2024.

VIA ECF

DATE: February 7, 2024.

SO ORDERED.

Hon. Lewis J. Liman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

A handwritten signature of Lewis J. Liman in black ink.

LEWIS J. LIMAN
United States District Judge

Re: *United States v. Michael Shvartsman, et. al.*, No. 23 Cr. 307 (LJL)

Dear Judge Liman:

We respectfully submit this letter pursuant to Rule 4(A) of Your Honor's Individual Rules, to request that the Court conduct a *Curcio* hearing as to our client, defendant Bruce Garelick, during tomorrow's proceedings in this case. Because the charges in this case arise from alleged conduct by Mr. Garelick in the course of his employment, his employer, which is indirectly majority-owned by co-defendant Michael Shvartsman, is advancing his legal fees. Although it is not clear to us whether the Court's Rule regarding "benefactor payments" is intended to cover this situation, in an abundance of caution we are providing this notice and making the request, to ensure that the record reflects Mr. Garelick's knowing and voluntary decision to waive any potential conflict that may exist.

We have alerted the government to our intention to make this request and asked it to prepare a proposed *Curcio* script for the Court. We understand that the government will be doing so and submitting its own letter to the Court, along with the proposed script.

Respectfully submitted,

/s/ Alexandra A.E. Shapiro

Alexandra A.E. Shapiro